

UNITED STATES DISTRICT COURT
 for the
Eastern District of Michigan

United States of America

v.

Joshua Long

Case No. 2:21-mj-30342

Judge: Unassigned,
 Filed: 07-08-2021

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 31 and April 5, 2021 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC §§ 841(a)(1), 846	Conspiracy to possess and distribute controlled substances

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: July 8, 2021

City and state: Detroit, MI


 Complainant's signature

Special Agent Daniel Ghareeb
 Printed name and title


 Judge's signature

Patricia T. Morris, US Magistrate Judge
 Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Daniel Ghareeb, being sworn, depose and state the following:

INTRODUCTION

1. This affidavit is in support of a criminal complaint charging Joshua LONG with attempting to possess with intent to distribute methamphetamine in violation of Title 21, United States Code, Sections. 846, 841(a)(1).

2. I am currently a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”) in Detroit, Michigan. I have been a Special Agent with HSI since 2007. Prior to my current assignment, I was a police officer with the North Baltimore Ohio Police Department for approximately two years. I hold a Bachelor of Science and a Master of Science in Criminal Justice. I have received specialized training about illegal drug trafficking and money laundering at the Federal Law Enforcement Training Center located in Brunswick, Georgia. I have led and participated in numerous investigations related to illegal drug trafficking as well as methods used to finance drug transactions and launder drug proceeds.

3. I make this affidavit based on my participation in this investigation, as well as information received from other law enforcement officials and/or their reports and records. The information outlined herein is

provided for the limited purpose of establishing probable cause and does not contain all information known to law enforcement pertaining to this investigation.

4. As set forth in more detail below, this investigation has shown that on or about April 5, 2021, Joshua LONG attempted to receive ten kilograms of (actual) methamphetamine to a residence at 408 Gilbert Street in Jackson, Michigan, located in the Eastern District of Michigan. There is probable cause to conclude LONG attempted to possess with an intent to distribute methamphetamine in violation of Title 21, United States Code, Sections 846, 841(a)(1).

PROBABLE CAUSE

5. On March 31, 2021, the United States Postal Inspector Service (USPIS) intercepted a 35-pound package that was mailed from Los Angeles to 408 Gilbert Street, Jackson, Michigan. The package was addressed to someone other than LONG at 408 Gilbert Street. Law enforcement databases located the named recipient which showed that individual lives in the state of Michigan over 80 miles away. I believe the recipient's name was used to disguise the true recipient of the package in the event the package was intercepted by law enforcement.

6. Inspectors obtained a federal search warrant for the package. Upon opening the package, agents found 13 heat-sealed bags containing approximately ten kilograms of suspected methamphetamine. A final laboratory analysis confirmed the drugs seized were 10.25 kilograms of 99% pure methamphetamine. I know this much methamphetamine is intended for further distribution. Inspectors also recovered 994 tablets. A final laboratory analysis confirmed the tablets contained a mixture of fentanyl, totaling 109.3 grams.

7. Agents then obtained a federal warrant to search 408 Gilbert Street in anticipation of the package being delivered there and opened (the Parcel). Agents replaced the drugs with a sham substance for the controlled delivery.

8. On April 5, 2021, law enforcement conducted a controlled delivery of the Parcel. A Postal Inspector delivered the Parcel to 408 Gilbert Street. A female who arrived shortly before delivery, opened the door, and took the package. After several minutes, agents received an alert that the Parcel had been opened. Michigan State Police executed the warrant and observed Joshua LONG inside the home, cross the living room from the location the Parcel was located and run upstairs. LONG and the female were the only two occupants of location.

9. During a search of 408 Gilbert Street, agents seized the Parcel and its contents from the dining room table where they saw LONG run from. A smaller box inside the parcel that contained a tracking device was pulled apart and thrown into a garbage can in the kitchen. Agents also seized other items I know are used to distribute drugs, including digital scales located inside the kitchen drawers, numerous sandwich baggies with the corners removed in the outside garbage along with opened mail addressed to LONG at 408 Gilbert Street.

10. In the dining room officers seized mail addressed to LONG, indicating LONG was a resident of 408 Gilbert Street. In addition, a note stating “408 Gilbert Stewart, Long Only!” was taped inside the mailbox. Agents also found LONG’s State of Michigan Identification card, his Social Security card and \$6,920 in cash in a bedroom.

11. USPIS determined that between March 31 and April 5, 2021, the parcel containing the ten kilograms of methamphetamine was tracked 117 times on the United States Postal Service website. Based on a Comcast response to a DEA Subpoena, the methamphetamine parcel was tracked approximately 100 times by the Comcast service subscribed at 408 Gilbert Street in Jackson, Michigan (subscribed to someone other than LONG).

CONCLUSION

12. Based on the above, probable cause exists to show that Joshua LONG attempted to possess with intent to distribute methamphetamine in violation of Title 21, United States Code, Sections 846, 841(a)(1).



Daniel Ghareeb
Special Agent
Homeland Security Investigations

Subscribed and sworn to before me
or by reliable electronic means.



Honorable Patricia T. Morris
United States Magistrate Judge